

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT SZABO,)	
)	
Plaintiff,)	
)	
v.)	No. 18cv6258
)	Judge Gettlerman
HARTFORD LIFE AND ACCIDENT)	Magistrate Judge Valdez
INSURANCE COMPANY,)	
)	
Defendant.)	
)	

PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT

Now comes the plaintiff, ROBERT SZABO (“Plaintiff”), by his attorneys, MARK D. DEBOFSKY, MATTHEW T. MALONEY, and DEBOFSKY SHERMAN CACCIARI REYNOLDS, P.C., and hereby moves for the entry of judgment in his favor and against the defendant, HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY (“Defendant”), pursuant to Fed. R. Civ. P. 52, on the ground that the preponderance of the evidence favors the entry of judgment in Plaintiff’s favor in this case for long-term disability benefits under § 502(a)(1)(B) of the Employee Retirement Income Security Act of 1974 (“ERISA”) (29 U.S.C. § 1132(a)(1)(B)). In support thereof, Plaintiff concurrently submits a separate Statement of Facts and Memorandum of Law.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendant, order Defendant to pay him for all wrongfully denied long-term disability benefits, plus prejudgment interest, in an amount equal to the contractual amount of benefits to which he is entitled from June 4, 2017 to present, less offsets for Social Security disability

payments covering the dates during which Hartford paid benefits to Plaintiff, and award his attorneys' fees and costs pursuant to ERISA §502(g) (29 U.S.C. § 1132(g)).

Dated: August 30, 2019

Respectfully Submitted,

/s/ Mark D. DeBofsky
/s/ Matthew T. Maloney

Mark D. DeBofsky
Matthew T. Maloney
Attorneys for Plaintiff
Robert Szabo

Mark D. DeBofsky
Matthew T. Maloney
DeBofsky Sherman Casciari Reynolds, P.C.
150 N. Wacker Dr., Suite 1925
Chicago, Illinois 60606
Voice: (312) 561-4040
Fax: (312) 929-0309
Email: mdebofsky@debofsky.com; mmaloney@debofsky.com

CERTIFICATE OF SERVICE

TO: Elizabeth G. Doolin
Sara G. Janes
Chittenden, Murday & Novotny LLC
303 W. Madison St., Suite 1400
Chicago, Illinois 60606
edoolin@cmn-law.com; sjanes@cmn-law.com

The undersigned attorney hereby certifies that on August 30, 2019, he electronically filed the foregoing PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT with the Clerk of the Court using the CMF/ECF filing system, which sent notice of such filing to the above-named attorneys.

/s/ Mark D. DeBofsky
/s/ Matthew T. Maloney

Mark D. DeBofsky
Matthew T. Maloney
Attorneys for Plaintiff
Robert Szabo

Mark D. DeBofsky
Matthew T. Maloney
DeBofsky Sherman Casciari Reynolds, P.C.
150 N. Wacker Dr., Suite 1925
Chicago, Illinois 60606
Voice: (312) 561-4040
Fax: (312) 929-0309
Email: mdebofsky@debofsky.com